CHAPTER 7
SITE INSPECTION

7-1. Introduction.

a. This chapter discusses the site inspection (SI) phase of an OE response action. An SI is performed following the approval of a positive INPR. The SI may be conducted prior to INPR approval only if an exception is granted by CEMP-R. The results of the SI are reported in an ASR. The OE Design Center is responsible for executing the SI. The district is responsible for reviewing the SOW, IGE, ASSHP, and RAC updates and providing written comments or concurrence or non-concurrence to the OE Design Center.

b. The purpose of the SI is to augment the data collected during the PAE, generate additional data, confirm any contamination on-site, reevaluate relative risk, and identify areas of known or suspected ordnance contamination. A historical summary of the site will be generated based on records reviews including maps, drawings and aerial photographs; interviews; and visual inspection of the site.

7-2. Site Inspection Process. There are four general steps in an SI: records search, ASSHP, site assessment, and risk assessment.

a. Records Search.

(1) The purpose of the records search is to locate and retrieve all appropriate documents regarding the site. The research team must include a team leader, an archivist/historian, and an OE Safety Specialist. Information gathered during the records search should include dates of operations or testing, the types and quantities of ordnance used or manufactured at the site, any actual or rumored incidents of OE contamination, and any former removal operations.

(2) Copies should be made of all documents applicable to the site and marked using standard archival techniques as to the location of the original document. A master record will be maintained which shows the location of the file, POC, address and telephone number, record group, and file and box number. All interviews will be documented and maintained as part of the Administrative Record.

(3) Possible sources of historical information include the following:

(a) Local Officials. The local fire department or law enforcement agencies would normally have information if ordnance has been found at a site. They may also have historical knowledge of activities at a site.

(b) Real Estate Records. Historical real estate records can be found at the district that provides or provided support for the site. These records may contain information concerning prior clearance actions. If the property has been sold or transferred to the public, current and historical property records at the local courthouse may provide clues to actual or possible contamination. In addition, if the property was leased by the government, the lease agreement should indicate the intended use at the time the lease was signed.

(c) National Archives. Official historical Army records are stored at the National Archives in Suitland, MD. These records can provide information concerning the site mission and use.

(d) Local Military Museums. Museums may contain information that indicates the potential ordnance hazards at a site. If the site has recently undergone closure, records concerning possible ordnance hazards may be located at the 52nd Ordnance Group company responsible for the particular geographical area. Records are maintained by the company for a maximum of three years and by EOD centralized records for a maximum of five years.

(e) The Industrial Operations Command (IOC). IOC is responsible for the Army's firearms and munitions. IOC is an excellent source of information on past munitions and chemical warfare production, testing, and storage sites. Headquarters IOC is located at Rock Island, Illinois and can be reached at 309-782-1272. IOC also maintains an archive at Aberdeen Proving Ground, MD.

(f) The Army Materiel Command (AMC). AMC Technical Escort Units (TEU) have the mission of responding to and rendering safe chemical agents and munitions. The TEUs are also responsible for escorting these items while in transit to safe storage or disposal areas. The TEUs would therefore be a good source of information for sites potentially contaminated with CWM. The main POC is located at Aberdeen Proving Ground, MD.

(g) Cartographic Records Office. This office is located in Washington, DC, and may be able to provide additional information, including maps and drawings.

b. ASSHP. After the records search phase has been completed and prior to the site survey, an ASSHP should be prepared and approved in accordance with the guidance provided in Chapter 20.

c. Site Assessment.

(1) A site assessment team is required for all properties being investigated. This is a multi-disciplinary team. The team must include an OE Safety Specialist classified in the 0018 series. The purpose of the site assessment is to research local archives, interview former employees of the site activity or others who may have valuable information on site history, and conduct a visual survey to determine the presence of OE. The site survey will be conducted

using avoidance techniques; intrusive activities and sampling will not be performed. The site survey will cease once the presence of OE is confirmed. The extent of OE contamination will not be determined during the site survey.

(2) The site survey team should identify the use of the property at present and attempt to locate evidence of previous ordnance use in the area. A Global Positioning System locator may be used to identify coordinates of areas identified by the site survey team. Magnetometers or other ordnance detectors may be used only for safety purposes by the OE Safety Specialist to reduce any possible threat of unseen ordnance hazards. The magnetometer or other ordnance detector should not be used as the sole safety precaution while walking in dense brush or heavy vegetation, which prevents seeing the ground and possible exposed ordnance. Areas that cannot be safely accessed should not be entered.

(3) If OE is found at a site which may present an imminent danger to the public, USAESCH must be contacted by phone as soon as possible to discuss interim actions. USAESCH may ask that local law enforcement officials be contacted in order to secure the site and that the local EOD unit be contacted. USAESCH will then coordinate with EOD and may provide an OE Safety Specialist to assess the risks and recommend a course of action.

d. Risk Assessment. The additional information collected during the SI is used to reevaluate the risk assessment performed during the PAE and subsequently reevaluate what further action, if any, is necessary at a site. The risk assessment will be performed using the RAC Worksheet included in Appendix B. Risk assessments must be performed by personnel experienced in evaluating explosive safety risks. Details regarding the risk assessment and RAC worksheet are presented in Chapter 6.

7-3. Archives Search Report.

a. The results of the SI are documented in the ASR. Archives Assessment Sheets will be completed in conjunction with the ASR, but are forwarded to the OE MCX under separate cover.

b. ASR Format. The format of the ASR is dependent on whether further action is recommended for the site.

(1) Recommendation of Further Action. If further action is recommended for a site, the ASR will be a two-volume document following the outline shown in Table 7.1. Appendix C contains a more detailed outline of the contents of each volume.

(2) Recommendation of No DOD Action Indicated (NDAI). If NDAI is recommended for a site, the ASR will follow the same general outline as shown in Table 7.1 but will not include Section 8, “Site Ordnance and Technical Data”. The ASR will be formatted in such a manner that the recommendations and conclusions may be easily separated from the rest of the report.

This may be accomplished by the development of two volumes as shown in Appendix C, or by the development of a single volume with a separate cover sheet indicating the conclusions.

c. ASR Technical Review. The ASR must be technically reviewed by the district and the OE MCX. The OE Design Center is responsible for ASR approval.

Table 7.1
Outline of Archives Search Report when Further Action is Recommended

Section	Title
1	Introduction
2	Previous Investigations
3	Site Description
4	Historical Ordnance Presence
5	Site Eligibility
6	Visual Site Inspection
7	Evaluation of Ordnance Hazards
8	Site Ordnance Technical Data
9	Other Environmental Hazards

d. USAESCH ASR Technical Advisory Group.

(1) The USAESCH ASR Technical Advisory Group (TAG) consists of representatives from the Directorate of Engineering, the OE Design Center, and the OE MCX. The ASR TAG is responsible for assessing the results of archives searches and providing a consensus of strategy for subsequent response actions. Only ASRs recommending further action are reviewed by the TAG. The TAG is not responsible for technical review of ASRs.

(2) Once an ASR recommending further action has been technically reviewed, the activity responsible for preparing the ASR will provide the ASR along with a fact sheet to the ASR TAG. Appendix D includes a sample ASR fact sheet to be used for this purpose.

(3) The ASR TAG will review the fact sheet, ASR, and comments; discuss the options available; and agree on a strategy for further action. Subsequent actions recommended by the ASR TAG may include TCRA, NTCRA (beginning with an EE/CA), a combination of TCRA and NTRCA actions, or NDAI.

(4) Upon completion of this review, the ASR TAG will create a revised fact sheet (including a strategy for subsequent action) for submittal to the OE Design Center. The recommendation from the TAG must be thoroughly justified in writing with reference to the potential for and significance of any imminent threat to human health, safety, and the environment. The TAG's recommendation will also include a time frame for initiation of the recommended subsequent action. The OE Design Center is then responsible for developing the programmatic cost estimate required to get the project onto the correct fiscal year work plan. The OE Design Center will perform project cost estimates.